

EXHIBIT B

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

JANE STREET GROUP, LLC,

Plaintiff,

v.

MILLENNIUM MANAGEMENT LLC,
DOUGLAS SCHADEWALD, and
DANIEL SPOTTISWOOD

Defendants.

Civil Action No. 24-cv-2783

Hon. Paul A. Engelmayer

**[PROPOSED]
CIVIL CASE MANAGEMENT
PLAN AND SCHEDULING
ORDER**

PAUL A. ENGELMAYER, U.S.D.J.:

After consultation with counsel for the parties, the Court adopts the following Civil Case Management Plan and Scheduling Order, in accordance with Federal Rules of Civil Procedure 16 and 26(f).

1. All parties **do not** consent to conducting further proceedings before a Magistrate Judge, including motions and trial, pursuant to 28 U.S.C. § 636(c).
2. This case is **not** to be tried to a jury.
3. No additional parties may be joined except with leave of the Court. Except for good cause shown, any motion to join additional parties or amend the pleadings must be filed within 30 days from the date of this Order.
4. Defendants must file any response to the Complaint no later than April 29, 2024. Any response must be filed under seal subject to a meet and confer with opposing counsel. The parties shall identify appropriate redactions and a redacted version shall be filed publicly within 2 days.
5. The parties must file a proposed protective order no later than April 25, 2024.
6. The parties must complete their initial disclosures under Federal Rule of Civil Procedure 26(a)(1) no later than April 26, 2024.

7. The parties must complete fact discovery necessary to prepare for a consolidated trial on liability and equitable matters by no later than June 5, 2024. Any damages claim is bifurcated.
8. If all parties consent in writing, they may extend the following interim deadlines without application to the Court, provided that the parties complete all fact discovery by the date set forth in paragraph 8. Under this Order's interim deadlines, the parties must:
 - a. Plaintiff will provide an identification of all trade secrets in numbered form and with specificity by April 26, 2024. The list of trade secrets may be amended upon good cause. The parties are directed to the procedure for identification of trade secrets set out in the Trade Secret Case Management Judicial Guide (2023) published by the Federal Judicial Center, §§ 4.4-4.7.
https://papers.ssrn.com/sol3/papers.cfm?abstract_id=4360102
 - b. Subject to the following limitations, the parties must substantially complete document production no later than May 15, 2024.
 - i. Each party shall have 10 days to respond to written discovery requests.
 - ii. Each side shall be allowed to serve no more than 25 requests for production; no more than 10 interrogatories; and no more than 5 non-authentication requests for admissions on each other party.
 - iii. Each party must produce all trading data for the teams led by Defendants Schadewald and Spottiswood and/or their successors at Jane Street in the Indian options and equity markets from the period of January 1, 2023, to April 22, 2024, by May __, 2024 .
 - c. Complete depositions of fact witnesses no later than June 5, 2024.
9. The parties must complete expert discovery no later than July 3, 2024.
10. If all parties consent in writing, they may extend the following interim deadlines without application to the Court, provided that the parties complete all expert discovery by the date set forth in paragraph 10. Under this Order's interim deadlines:
 - a. Plaintiff must make the disclosures required by Federal Rule of Civil Procedure 26(a)(2) no later than June 7, 2024.
 - b. Defendants shall make the disclosures required by Federal Rule of Civil Procedure 26(a)(2) no later than June 21, 2024.
 - c. Plaintiff(s) anticipate expert testimony concerning the following issue(s): Trade secrets, industry custom and practice.

- d. Defendant(s) anticipate expert testimony concerning the following issue(s): Trade secrets, industry custom and practice.
11. No later than 14 days following the close of fact discovery, all counsel must meet face-to-face, either in person or by video conference, for at least one hour to discuss settlement.
 12. The Joint Pretrial Order date is July 3, 2024. By the Joint Pretrial Order date, the parties shall submit a Joint Pretrial Order prepared in accordance with the undersigned's Individual Rules and Practices and Fed. R. Civ. P. 26(a)(3).
 13. Each side shall file no more than three motions in limine (including *Daubert* motions), no more than 4 pages each, and any motions in limine shall be filed after the close of discovery on or before the Joint Pretrial Order date.
 14. Further, on or before the Joint Pretrial Order date the parties shall file any exhibits; any deposition excerpts; any written direct testimony; and any memoranda of law on issues useful to the Court. Memoranda of law on issues useful to the Court shall be no more than 10 pages.
 15. The parties shall file a list of trial cross-examination witnesses no later than July 11, 2024.
 16. Each side shall file any opposition to motions in limine (including *Daubert* motions) and any opposition to memoranda of law on issues useful to the Court no later than July 10, 2024. Any opposition to motions in limine shall not exceed 4 pages.
 17. The Final Pretrial Conference is scheduled for July __, 2024.
 18. Trial is scheduled for July __ - __. The parties anticipate that the trial will last three days.
 19. The parties shall file proposed findings of fact and conclusions of law no later than August 5, 2024.
 20. The parties shall file any response to proposed findings of fact and conclusions of law no later than August 19, 2024.

This ORDER may not be modified or the dates herein extended, except by further Order of this Court for good cause shown. Any application to modify or extend must be made in a written application in accordance with the Court's Individual Practices.

Dated: New York, New York

SO ORDERED.

Paul A. Engelmayer
United States District Judge